

**Exhibit 3**

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**From:** Pavel, Ashley  
**Sent:** Thursday, August 8, 2019 1:00 PM  
**To:** Herring, Angela K.; Bassett, Nicholas A. (Paul Hastings LLP); Clark, Brandon C.  
**Cc:** Brian.Liegel@weil.com; Debora.Hoehne@weil.com; gregory.silbert@weil.com; Jeremy.Auster@weil.com; Jeremy.Cain@weil.com; Polkes, Jonathan D. (Weil, Gotshal & Manges LLP); Lara.Ting@weil.com; lauren.haiken@weil.com; Goldstein, Marcia L. (Weil, Gotshal & Manges LLP); Moshe.Fink@weil.com; National.Puerto.Rico.Receiver.Litigation.Team@weil.com; remmanuelli@me.com; Reed.Collins@weil.com; robert.berezin@weil.com; eworenklein@debevoise.com; To, My Chi (Debevoise & Plimpton LLP); Bongartz, G. Alexander (Paul Hastings LLP); Tenzer, Andrew V. (Paul Hastings LLP); Bliss, James R. (Paul Hastings LLP); Worthington, James B. (Paul Hastings LLP); lucdespins@paulhastings.com; Comerford, Michael (Paul Hastings LLP); Jimenez, Pedro; Zwillinger, Zachary S.; Wolf, Amy R.; Kleinhaus, Emil A.; Celentino, Joseph C.; Lynch, John F.; Mason, Richard G.; edward.linden@stblaw.com; Fell, Jamie (Simpson Thacher & Bartlett LLP); sarah.phillips@stblaw.com; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP); Baker, Nicolas (Simpson Thacher & Bartlett LLP); Qusba, Sandeep (Simpson Thacher & Bartlett LLP); notificaciones@bufete-emmanuelli.com; rolando@bufete-emmanuelli.com; jessica@bufete-emmanuelli.com; lft@tcm.law; mfb@tcm.law; nperez@tcm.law; ebarak@proskauer.com; Carino, Elisa M.; Mashberg, Gregg M. (Proskauer Rose LLP); Jones, Jennifer L.; Geary, Laura M.; Stafford, Laura (Proskauer Rose LLP); Wolf, Lucy C.; mbienenstock@proskauer.com; Dale, Margaret A. (Proskauer Rose LLP); Mervis, Michael T. (Proskauer Rose LLP); Possinger, Paul V. (Proskauer Rose LLP); Bill.Natbony@cwt.com; casey.servais@cwt.com; Halstead, Ellen (Cadwalader, Wickersham & Taft LLP); Hawkins, Howard R. (Cadwalader, Wickersham & Taft LLP); Ellenberg, Mark C. (Cadwalader, Wickersham & Taft LLP); thomas.curtin@cwt.com; devlawoffices@gmail.com; NHamerman@KRAMERLEVIN.com; Byowitz, Alice J. (Kramer Levin Naftalis & Frankel LLP); Caton, Amy (Kramer Levin Naftalis & Frankel LLP); Horowitz, Gregory Aaron (Kramer Levin Naftalis & Frankel LLP); Mayer, Thomas Moers (Kramer Levin Naftalis & Frankel LLP); McKeen, Elizabeth L.; Mitchell, Nancy; Friedman, Peter; Yang, Roger; Roth, Joseph L.  
**Subject:** RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Angie-

We have now been able to follow up with the relevant consultants, outside and regulatory counsel, and personnel at PREPA regarding your request that we investigate: (1) whether PREPA had any communications with creditors or with PREB about the Rate Motion and (2) whether any non-privileged materials underlying the Rate Motion exist.

As to the first question, we have not located any communications with creditors before the Rate Motion was filed. We have, however, located inquiries from creditors' advisors asking to discuss the motion after it was filed. We will produce these to you.

As to the second question, the majority of the materials we located through a reasonable search of the relevant custodians' files were privileged communications with outside counsel and regulatory counsel regarding the preparation of the motion. However, we have located at least one non-privileged document regarding how to implement the Settlement Charge. We can agree to produce this document, as well as any other non-privileged documents regarding the Rate Motion that we may locate through further document review.

However, given that Judge Dein has held that the Committee's requests pertaining to the Settlement Charge are beyond the scope of 9019 discovery, we do not think we should be required to designate a witness to testify about the Rate Motion.

Please let us know if this compromise will resolve the Fuel Line Lenders' pending motion to compel or if you still intend to move forward.

## O'Melveny

**Ashley Pavel**

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**From:** Herring, Angela K. <AKHerring@wlrk.com>

**Sent:** Friday, August 2, 2019 7:01 AM

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**Subject:** RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Liz and Margaret –

Following up on our call yesterday, we do intend to file our motion today. Please let me know if the below proposed briefing schedule works or if you have an alternate proposal.

Thanks,  
Angie

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**From:** Herring, Angela K.

**Sent:** Thursday, August 1, 2019 3:27 PM

**To:** 'Bassett, Nicholas' <[nicholasbassett@paulhastings.com](mailto:nicholasbassett@paulhastings.com)>; 'Pavel, Ashley' <[apavel@omm.com](mailto:apavel@omm.com)>; 'Clark, Brandon C.' <[BClark@proskauer.com](mailto:BClark@proskauer.com)>

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**Subject:** RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

All:

Per my note last night, we plan to file a motion to compel with respect to our July 15 discovery requests tomorrow (Friday, August 2). Given the current discovery schedule, we will also seek an expedited briefing schedule – we propose a response deadline of Wednesday, August 7 and a reply deadline of Friday, August 9. Based on the Court's July 12 Order stating that it will take post-July 16 motions on submission, we are not proposing a hearing date. Please let us know if the Government Parties intend to object to this scheduling request.

Thanks,  
Angie

**Angela K. Herring**

**Wachtell, Lipton, Rosen & Katz**

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**Subject:** RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Ashley,

Do you have any update on your diligence concerning the existence of documents relating to the Rate Motion? Given the tight timing, we intend to move to compel production of documents and testimony this week, though we remain willing to meet and confer further.

Regards,  
Angie

**Angela K. Herring**

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**Subject:** RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

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The Committee reserves the same rights. Thank you.



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**Subject:** [EXT] RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Ashley,

Thank you for the update. Particularly in light of this delay, we reserve all rights to seek relief from the discovery schedule based on the timing of any production in response to these requests (as a result of court order or otherwise).

Regards,  
Angie

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**Subject:** RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

\*\*\* EXTERNAL EMAIL \*\*\*

Angela-

The relevant PREPA personnel are currently out of the office. We are hoping to have an update for you early next week.

Best,  
Ashley

**O'Melveny**

**Ashley Pavel**

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**Subject:** RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Ashley and Brandon,

Following up on our call on Monday, I'm writing to see if you have any update on the diligence we discussed concerning the existence of communications with PREB, among any of the RSA parties, or within PREPA relating to the Rate Motion.

Regards,  
Angie

**Angela K. Herring**

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**Subject:** RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Brandon,

The issue we wish to discuss is the Government Parties' refusal to provide any discovery on the rate motion, which seeks to offset the RSA's Settlement Charge by reducing base rates. We believe the discovery we've requested is relevant to the 9019 motion, and your objection as to timeliness is misplaced in light of the failure of the Government Parties to let our clients know about the rate motion before the deadline you're seeking to invoke. We look forward to discussing these issues at 5:00 pm.

Regards,  
Angie

**Angela K. Herring**

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**Sent:** Sunday, July 21, 2019 12:18 AM

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**Subject:** RE: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

\*\*\* EXTERNAL EMAIL \*\*\*

Angela & Nick ~

In order for us to most effectively use our time during the meet-and-confer that has been scheduled for Monday afternoon, we ask that you provide us advance notice of the issues you wish to discuss relating to the Government Parties' responses to discovery requests.

Thanks,  
Brandon

**Brandon C. Clark**

Associate

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**Subject:** Re: PREPA - 9019 Motion - AAFAF and PREPAs Responses and Objections to Discovery

Angela and Nick- O'Melveny and Proskauer can talk at 5 on Monday. If that works for the Fuel Line Lenders and the Committee, please circulate a calendar invitation.

On Jul 20, 2019, at 8:56 AM, Bassett, Nicholas <[nicholasbassett@paulhastings.com](mailto:nicholasbassett@paulhastings.com)> wrote:

The Committee requests to participate in the meet and confer as well.

Nick Bassett  
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On Jul 20, 2019, at 11:53 AM, Herring, Angela K. <[AKHerring@wlrk.com](mailto:AKHerring@wlrk.com)<<mailto:AKHerring@wlrk.com>>>> wrote:

Counsel:

Please let us know your availability on Monday afternoon or Tuesday to meet and confer concerning the Government Parties' responses and objections served last night. We'd like to discuss as soon as possible, as we will move to compel absent a resolution.

Regards,

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Counsel-

Please see the attaches responses and objections to the discovery requests served on AAFAF and PREPA by the  
Fuel Line Lenders on July 15, 2019 and the UCC on July 16, 2019.

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